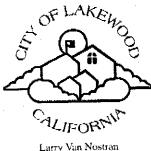
11/15/06 Bd Mtg Item____ San Gabriel River TMDL Deadline: 10/27/06 12pm

Todd Rogers Council Member

Diane DuBois
Vice Mayor

Steve Croft Council Member



Mayor

Joseph Esquivel Council Member

October 27, 2006

Honorable Tam Doduc, Board Chair State Water Resources Control Board 1001 I Street Sacramento, CA 95814

Attn: Song Her, Clerk to the Board



Dear Chair Doduc:

The City of Lakewood would like to provide the following comments on the San Gabriel River Metals TMDL (TMDL) for your consideration. While we support the State Water Resources Control Board's goals of improving surface water quality in the region, we have the following concerns:

- Many of the sources of metals found in surface waters are beyond the regulatory control of local government.
- Orange County (O.C.) Cities and Los Angeles (L.A.) County Cities should be regulated in a similar manner. The proposed TMDL provides unequal treatment for L.A. and O.C. cities in the watershed.
 - L.A. County cities will be held accountable for atmospheric deposition, while the cities in the Santa Ana Region are exempt.
 - O The TMDL will result in the cities in L.A. County being given waste load allocations for metals beyond their regulatory control, while the O.C. cities are exempt. The TMDL's requirements within the watershed should be consistent between the two Regional Boards
- The State Board should suspend the metal reduction requirements in the San Gabriel River Metals TMDL until these studies are completed. The L.A. River was suspended until 2011.
- TMDL's Numeric Limits are infeasible at this time.
- Lack of a design storm complicates TMDL implementation. The TMDL requires compliance with all size of storm events, regardless of practicality or cost factors.
- An Environmental Impact Report or proper functional equivalent document (FED) for the TMDL must be prepared rather than the negative declaration proposed, given the potentially significant adverse environmental impacts that may result from the TMDL.

Lakewood

- We are concerned that the City will have to finance the TMDL requirements with General Fund monies. As a result, the City would be required to reduce, eliminate or defer existing critical services to pay for the new TMDL requirements.
- The cities in the San Gabriel River Metals TMDL were given less time to comply
 than the cities affected by the L. A. River Metals TMDL. L.A. River cities have
 given between six and eight additional years to reach the dry and wet weather
 requirements.

The City of Lakewood requests that the State Board remand the TMDL to the Regional Board to address the concerns noted in this letter. We encourage the Board to strengthen its efforts to base regulations on sound science and methods, and to proceed in a manner that is practical, achievable and cost-effective. Moving forward in a practical and reasoned manner is especially critical, since many of the sources of metals found in surface waters are beyond the regulatory control of local government.

Thank you for your consideration.

Sincerely,

Lisa Ann Rapp

Lisa ann Rapp

Director of Public Works

cc: